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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	Dkt. No.
SARA ROCCISANO	:	
	:	
Plaintiff,	:	
	:	
- against -	:	
	:	
CENTRICA BUSINESS SOLUTIONS US, INC.	:	
	:	
Defendant.	:	
	:	
-----	X	

**INTRODUCTION**

1. This is an action brought under Title VII of the Civil Rights Act of 1964, and the New York City Human Rights Law for sex discrimination on behalf of Sara Roccisano, a former employee of Centrica Business Solutions US, Inc. (“Centrica”).

2. Ms. Roccisano worked from 2017 to 2019 at Centrica and was successful and well regarded until she was assigned to new managers in early 2018. The new managers denied Ms. Roccisano a promotion for which she was well qualified, choosing a less qualified man instead, and then marginalized and demoted her. In November 2019, Ms. Roccisano was terminated as part of a reduction in force while less qualified male employees were retained.

### **THE PARTIES**

3. Plaintiff Sara Roccisano is a female who lives in New York, New York.

4. Defendant Centrica Business Solutions US, Inc. is a corporation organized under the laws of Delaware with its principal place of business in Ballston Lake, New York.

### **JURISDICTION AND VENUE**

5. This Court has jurisdiction over Ms. Roccisano's Title VII claim pursuant to 28 U.S.C. § 1343 and § 1331. Mr. Roccisano filed a complaint with the Equal Employment Opportunity Commission ("EEOC") on or about February 4, 2020. The EEOC issued a right to sue letter, attached hereto as Exhibit A, on December 3, 2020.

6. Venue is properly before this Court pursuant to 28 U.S.C. § 1391 as Plaintiff was employed in this District and therefore substantial part of the events or omissions giving rise to the claim occurred in this District.

### **STATEMENT OF FACTS**

7. Ms. Roccisano received an engineering degree from Cornell University and an MBA from New York University.

8. Prior to being hired at Centrica, Ms. Roccisano had over fifteen years of relevant work experience, including positions in investment banking and finance.

9. Ms. Roccisano was hired at Centrica in April 2017 as a Commercial Financing Manager.

10. Ms. Roccisano was originally hired and supervised by Matt Wheatley. Mr. Wheatley provided Ms. Roccisano with an extremely strong year end 2017 review and she received an above-target bonus and raise.

11. In February 2018, Stephen Prince became Ms. Roccisano's ultimate

supervisor.

12. When Mr. Prince met Ms. Roccisano and learned what she did and to whom she reported, he immediately told her that he thought her role should be handled by a male employee. Mr. Prince later inquired about Ms. Roccisano's marital status (she is single) and also made a negative remark about older women who had not been married.

13. Ms. Roccisano began to be treated less favorably than similarly situated male employees.

14. Shortly after Mr. Prince took over the department, Mr. Wheatley took another position within the company and Ms. Roccisano applied for Mr. Wheatley's position. Around that time, Ms. Roccisano presented to Mr. Prince and Mr. Wheatley about her duties and accomplishments and according to Mr. Wheatley, Ms. Roccisano presented herself very effectively.

15. Not only did Mr. Prince not offer Ms. Roccisano the position, but Mr. Prince directed Ms. Roccisano to interview a male external candidate, Dan Svejnar, who had less experience and inferior qualifications compared to her. Specifically, while Ms. Roccisano has an engineering degree and an MBA, Mr. Svejnar has neither. Yet Mr. Svejnar was offered the position.

16. Mr. Prince also isolated Ms. Roccisano by moving her desk to a remote part of the office in April 2018.

17. In October 2018, Ms. Roccisano was demoted to the position of Senior Associate and the employee she was supervising was assigned to report to another supervisor. Ms. Roccisano was then assigned junior level work duties, including performing support duties for the team doing the work she had been originally hired to do

herself. Mr. Svejnar also humiliated Ms. Roccisano by requiring her to cancel her lead coordination and participation in a panel event at an international conference that she had been involved in organizing.

18. Mr. Prince was rude and dismissive of Ms. Roccisano in a way he was not with male employees, speaking over her and interrupting her conversations with colleagues and external counterparties.

19. In Ms. Roccisano's 2018 year-end review, her strong performance was acknowledged but she was still given a below target bonus and raise.

20. Despite the mistreatment, including the continuing assignment of junior level work, Ms. Roccisano continued her strong performance and was a major contributor in the company, landing one of the two largest deals in her area in 2019.

21. Yet, despite this success, Ms. Roccisano's employment was terminated on or around December 4, 2019 as part of a reorganization. Ms. Roccisano was selected for termination while worse performing male employees, such as John Markwell, were retained and promoted.

**FIRST CLAIM FOR RELIEF**  
(Sex Discrimination in Violation of Title VII)

22. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

23. Defendant discriminated against and harassed Plaintiff in the terms and conditions of her employment, based on her sex, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e.

**THIRD CLAIM FOR RELIEF**  
(Sex Discrimination in Violation of NYCHRL)

24. Plaintiff repeats and re-alleges the allegations contained in the preceding paragraphs above as if fully set forth herein.

25. Defendant discriminated against and harassed Plaintiff in the terms and conditions of her employment based on her sex in violation of the NYSHRL.

WHEREFORE, Plaintiff demands judgment:

1. Reinstating Plaintiff's employment and upon reinstatement, enjoining Defendant from harassing Plaintiff on the basis of her sex, in the terms and conditions of her employment;
2. Awarding Plaintiff back pay;
3. Awarding Plaintiff compensatory damages, including but not limited to damages for emotional distress;
4. Awarding Plaintiff punitive damages;
5. Awarding reasonable attorneys' fees, costs, and expenses, and

Granting such other legal and equitable relief to the Plaintiff as the Court may deem just and equitable.

**JURY DEMAND**

Plaintiff demands trial by jury of all issues as of right by a jury.

Dated: New York, New York  
March 2, 2021

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/s

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